FILED
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CLERK, U.S. DISTRICT COURT
ALEXANDRIA, VIRGINIA

IN THE UNITED STATES DISTRICT COURT FOR THE

EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA	)	CRIMINAL NO. 1:09 CR 175
	)	
v.	)	Counts 1-4: 18 U.S.C. §1343
	)	(Wire Fraud)
ANGELINA LAZAR,	)	
	)	
Defendant	)	

INDICTMENT

April 2009 Term at Alexandria

COUNT ONE

THE GRAND JURY CHARGES THAT AT ALL TIMES MATERIAL:

I. Introduction

1. ANGELINA LAZAR, the defendant herein, was a resident of Chicago, Illinois, and then a resident of Las Vegas, Nevada. The defendant was also the owner and president of Charismatic Exchange, Inc., a Las Vegas corporation.

II. The Scheme And Artifice To Defraud

2. Beginning on or about late May 2005 and continuing until approximately February 2007, in the Eastern District of Virginia, and elsewhere, the defendant LAZAR knowingly engaged in a scheme and artifice to defraud individual investors.

3. It was part of the defendant's scheme to defraud that, through her company Charismatic Exchange, she would solicit investments from individuals throughout the United States under the pretense that she would use those funds to engage in foreign

currency trading for their benefit, when she had no intention to use their funds for currency trading and in fact used the funds for personal or miscellaneous office expenses or to pay off earlier investors.

4. As part of her solicitation, the defendant would and did falsely represent that she was so successful at foreign currency trading that she could guarantee for the investor a monthly return of approximately 20 percent or more. As a further part of her scheme to defraud, the defendant represented to investors that she had and used a special software program that greatly enhanced her ability to successfully trade foreign currencies, when in fact the defendant only possessed and used a demonstration copy of the software which reflected simulated trades, as opposed to actual trades.

5. It was a further part of the scheme to defraud for the defendant to use interstate emails and telephone calls for the purpose of executing the aforesaid scheme and artifice to defraud.

III. The Use Of Interstate Wire Communications

6. On or about May 28, 2005, in the Eastern District of Virginia, and elsewhere, the defendant ANGELINA LAZAR, having devised and intending to devise the aforesaid scheme and artifice to defraud, knowingly caused to be transmitted by means of wire communication in interstate commerce certain signs, signals, and

sounds for the purpose of executing such scheme and artifice to defraud, in that the defendant willfully caused an email to be transmitted from one state to another state, through the America Online (AOL) server in the Eastern District of Virginia, which email solicited an individual to invest in foreign currency trading through Charismatic Exchange.

(In violation of Title 18, United States Code, Section 1343).

COUNT TWO

THE GRAND JURY CHARGES FURTHER THAT AT ALL TIMES MATERIAL:

1. Paragraphs 1 through 5 of the Count One are hereby realleged as setting forth the scheme and artifice to defraud.

2. On or about February 23, 2006, in the Eastern District of Virginia, and elsewhere, the defendant ANGELINA LAZAR, having devised and intending to devise the aforesaid scheme and artifice to defraud, knowingly caused to be transmitted by means of wire communication in interstate commerce certain signs, signals, and sounds for the purpose of executing such scheme and artifice to defraud, in that the defendant willfully caused an email to be transmitted from one state to another state, through the America Online (AOL) server in the Eastern District of Virginia, which email attempted to lull an investor into believing that the defendant would pay him his promised return in the near future.

(In violation of Title 18, United States Code, Section 1343).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT AT ALL TIMES MATERIAL:

1. Paragraphs 1 through 5 of the Count One are hereby realleged as setting forth the scheme and artifice to defraud.

2. On November 20, 2006, between 4:14 pm and 4:23 pm, Eastern Standard Time, in the Eastern District of Virginia, and elsewhere, the defendant ANGELINA LAZAR, having devised and intending to devise the aforesaid scheme and artifice to defraud, knowingly caused to be transmitted by means of wire communication in interstate commerce certain signs, signals, and sounds for the purpose of executing such scheme and artifice to defraud, in that the defendant willfully caused a telephone call from the Eastern District of Virginia to Las Vegas, Nevada, which phone call was used by the defendant to confirm that she had successfully engaged in specific foreign currency trades, when in fact, what the defendant was referring to in the phone call was a document that gave an incomplete listing of her simulated, not actual, foreign currency trades.

(In violation of Title 18, United States Code, Section 1343).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT AT ALL TIMES MATERIAL:

1. Paragraphs 1 through 5 of the Count One are hereby realleged as setting forth the scheme and artifice to defraud.

2. On or about December 13, 2006, in the Eastern District of Virginia, and elsewhere, the defendant ANGELINA LAZAR, having devised and intending to devise the aforesaid scheme and artifice to defraud, knowingly caused to be transmitted by means of wire communication in interstate commerce certain signs, signals, and sounds for the purpose of executing such scheme and artifice to defraud, in that the defendant, while outside the United States, willfully caused a voice message to be left on a telephone of a person in the Eastern of Virginia, whom the defendant believed to be a potential investor, which message urged the potential investor to send her and "Alfonso the banker," a confirmation of a wire transfer of funds intended to be used for foreign currency trading.

(In violation of Title 18, United States Code, Section 1343).

A TRUE BILL:

Pursuant to the E-Government Act, the original of this page has been filed under seal in the Clerk's Office.

FOREMAN

Dana J. Boente
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